1	MARKMAN LAW			
2	David A. Markman, Esq. Nevada Bar No. 12440 4484 S. Pecos Rd., Suite 130 Las Vegas, NV 89121 P: (702) 843-5899 F: (702) 843-6010			
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5	<u>David@Markmanlawfirm.com</u> Attorneys for Defendant			
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7	UNITED STATES DISTRICT COURT			
8	DISTRICT OF NEVADA			
9	VERIFY SMART CORP.,	CASE NO.: 3:24-cv-00559-MMD-CLB		
10	Plaintiff,	ODDED CDANTING STIDIU ATION TO		
12	VS.	ORDER GRANTING STIPULATION TO EXTEND DEFENDANT'S RESPONSIVE		
13	COLLEEN SCAMMELL,	PLEADING TO COMPLAINT		
14	Defendant.	[FIRST REQUEST]		
15				
16	Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel o			
17	record, hereby stipulate and request that this Court extend time for Defendant COLLEEN			
18	SCAMMELL ("Defendant") to file a responsive pleading in the above-captioned case. The			
19	extension for thirty (30) days, up to and including Friday, May 9, 2025, is stipulated by and			
20	between the parties. Counsel for Defendant was recently retained and filed their Notice of			
21	Appearance on April 9, 2025. Counsel respectfully requests additional time to review the facts of			
22	the case in order to file its Response to the Plaintiff's Complaint. In support of this Stipulation			
23	and Request, the parties state as follows:			
24	1. On December 5, 2024, Plaintiff fi	iled its Complaint (Dkt. 1) against Defendant		
25				
26	Colleen Scammell ("Defendant")			
27	2. On December 27, 2024, the Court issued the Summons (Dkt. 8) to be served on			
28	Defendant in this matter.			

1	3. Upon information and belief, on March 20 th , 2025, Plaintiff was served the Summons			
2	and Complaint in this matter at her home in Canada Coquitlam, BC.			
3	4. Based on the March 20, 2025 service, Defendant's responsive pleading is due on or			
4		before April 10, 2025.		
5	5.	Defendant who lives in Canada retained the undersigned counsel, on April 8, 2025.		
6	6.	Upon information and belief, Counsel believes there are previous lawsuits filed between		
7		the parties.		
8	7.	7. Based on there being previous litigation, the nature of the contract, the Client being out		
9	of state, and the recent retention of counsel, Defendant's counsel believe good cause			
10		exists for a short extension of time to	respond to the Complaint.	
11	8.	The parties agree that Defendant shal	l have until May 9, 2025 to file a responsive	
12		pleading in this matter.		
13	IT IS SO STIPULATED.			
14	Dated this 10 th day of April , 2025. Dated this 10 th day of April , 2025.			
15	MARKMAN LAW SPENCER FANE, LLP			
16	By: /s/ David Markman By: /s/ Richard Holley			
17	DAVID MARKMAN, ESQ. Nevada Bar. No. 12440 4484 S. Pecos Rd. #130 Las Vegas, Nevada 89121 Telephone: 702-843-5899		Richard F. Holley, Esq.	
18			Nevada Bar No. 3077 300 South Fourth Street, Suite 1600	
19			Las Vegas, Nevada 89101 Telephone: 702.408.3400	
20	Ema	il: <u>David@MarkmanLawFirm.com</u>	Email: rholley@spencerfane.com	
21			LUCOSKY BROOKMAN LLP	
22			Jean-Marc Zimmerman, Esq. (Admitted Pro Hac Vice)	
23			Email: jmzimmerman@lucbro.com 101 Wood Avenue South	
24			Woodbridge, New Jersey 08830	
25	IT IS SO	O ORDERED.	Telephone: (908) 768-6408	
26		o: April 11, 2025		
27				
28			Golden	
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- 2 -

UNITED STATES MAGISTRATE JUDGE